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8 THE NATURE CONSERVANCY

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 Does 1-150, Individual Persons,

13 Plaintiffs,

14 v.

15 UNITED STATES DEPARTMENT OF
INTERIOR ("INTERIOR"), a federal agency;
16 DOUG BURGUM, Secretary of the Interior;
NATIONAL PARK SERVICE, a federal
17 agency; JESSICA BOWRON, Acting Director
of the National Park Service; DAVID
18 SZYMANSKI, Regional Director, Pacific West
Region; THE NATURE CONSERVANCY, a
19 District of Columbia nonprofit corporation,

20 Defendants.
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Case No. 3:25-cv-01115-MMC

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
TIME FOR THE NATURE
CONSERVANCY TO RESPOND TO
COMPLAINT**

Complaint Filed: February 3, 2025

Trial Date: None set.

Judge: Hon. Maxine M. Chesney

1 WHEREAS, Plaintiffs DOES 1-150 served Defendant The Nature Conservancy with their
2 Summons and Complaint on March 14, 2025; and

3 WHEREAS, The Nature Conservancy's response to the Complaint is due no later than April
4 4, 2025; and

5 WHEREAS, The Nature Conservancy has requested and Plaintiffs have agreed to an
6 extension of twenty-eight (28) days beyond April 4, 2025, for The Nature Conservancy to respond
7 to the Complaint.

8 NOW THEREFORE, Plaintiffs and The Nature Conservancy stipulate to and respectfully
9 request that the Court enter an Order granting The Nature Conservancy up to and including May 2,
10 2025, to file its response to the Complaint.

11 **IT IS SO STIPULATED.**

12 Dated: March 19, 2025

HANSON BRIDGETT, LLP

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14 By: /s/ Andrew G. Giacomini
Andrew G. Giacomini

15 Attorneys for Plaintiffs
16 DOES 1-150

17 Dated: March 19, 2025

JONES DAY

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19 By: /s/ Thomas M. Donnelly
Thomas M. Donnelly

20 Attorneys for Defendant
21 THE NATURE CONSERVANCY
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FILER'S ATTESTATION

I, Thomas M. Donnelly, am the ECF User whose ID and password are being used to file this Joint Stipulation and [Proposed] Order to Extend Time for Defendant The Nature Conservancy to Respond to the Complaint. In compliance with Local Rule 5.1., I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 19, 2025

JONES DAY

By: /s/ Thomas M. Donnelly
Thomas M. Donnelly

~~[PROPOSED]~~ ORDER

Having considered the parties' Stipulation to Extend Time for The Nature Conservancy to Respond to Complaint, filed with this Court on March 19, 2025, and good cause appearing therefor,

IT IS HEREBY ORDERED as follows:

The Nature Conservancy shall have a 28-day extension to respond to the Complaint in this action, making The Nature Conservancy's response to the Complaint due no later than **May 2, 2025**.

Dated: March 19, 2025


HON. MAXINE M. CHESNEY
U.S. District Court Judge